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10/16/2020

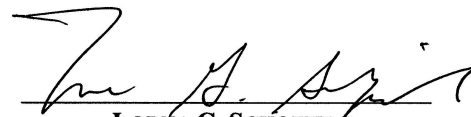
**Via ECF and Email**

The Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Application Granted. Defendant Sharma's sentencing submission shall be filed on or before **November 16, 2020**. The Government's submission shall be filed on or before **November 30, 2020**. The Clerk of the Court is directed to terminate the letter motion at docket number 398.

Dated: October 20, 2020  
New York, New York

**Re: United States v. Sohrab Sharma, et al. (18 Cr. 340)**  
Sohrab "Sam" Sharma

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

The defendant, Sohrab "Sam" Sharma ("Sharma"), respectfully requests this Court revisit its ruling and grant a twenty-eight day extension of time to file the sentencing submission in this matter until November 16, 2020 with the government response due two weeks later on November 30, 2020. The government consents to this request.

The defense objections to the PSR were timely submitted to U.S. Probation on October 9, 2020. The government is now in the process of responding to the defense objections and the parties have had multiple, lengthy phone conferences working together in an attempt to narrow the issues in dispute to avoid and/or limit the need for a *Fatico* hearing. As a result, the PSR has not yet been finalized, which is necessary for the defense to properly prepare the sentencing memorandum.

Additionally, while the defense had been diligently working on the objections to the PSR, it has also had multiple phone conferences with the government in a successful effort to reach agreement on an interlocutory sale so the seized funds can be returned to the victims as soon as possible. Finally, the defense has also spent a significant amount of time in the past month conferencing with the government to reach a resolution on the complex restitution issues in this case. The parties are on the verge of reaching an agreement in principle which will obviate the need for a lengthy and complicated restitution hearing.

The defense is also still in the process of gathering records and preparing reports to support the arguments in the sentencing submission. All of the above efforts and reasons noted, in addition to the defense counsels' regular caseload, require the defense to respectfully request this additional time to properly prepare a sentencing memorandum and request for a downward variance.

Respectfully submitted,

/s/ Gennaro Cariglio Jr.

Gennaro Cariglio Jr.

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CC: All counsel of record